

John F. Dienelt, Esq.
 Barry M. Heller, Esq.
 DLA Piper US LLP
 1200 Nineteenth Street, N.W.
 Washington, DC 20036-2412
 (202) 861-3880 (telephone)
 (202) 223-2085 (fax)

Howard S. Trickey, Esq.
 Diane F. Vallentine, Esq.
 Jermain, Dunnagan & Owens, P.C.
 3000 A Street, Suite 300
 Anchorage, Alaska 99503
 (907) 563-8844 (telephone)
 (907) 563-7322 (fax)

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ALASKA
 AT ANCHORAGE

ALASKA RENT-A-CAR, INC., an)
 Alaska Corporation,)

Plaintiff,)

v.)

Case No. 3:03-cv-00029-TMB

CENDANT CORPORATION,)
 AVIS RENT-A-CAR SYSTEM, INC.,)
 AVIS GROUP HOLDINGS, INC., CENDANT)
 CAR RENTAL GROUP, INC., AVIS CAR)
 RENTAL GROUP, INC., and BUDGET RENT)
 A CAR SYSTEM, INC.,)

Defendants.)

**MEMORANDUM IN SUPPORT OF
 EXPEDITED CONSENT MOTION FOR EXTENSION TO COMPLY
WITH ORDER [RE: SEALED DOCUMENTS] AT DOCKET 336**

LAW OFFICES OF
JERMAIN DUNNAGAN & OWENS
 A PROFESSIONAL CORPORATION
 3000 A STREET, SUITE 300
 ANCHORAGE, ALASKA 99503
 (907) 563-8844
 FAX (907) 563-7322

In the Order [Re: Sealed Documents] at Docket 336, this Court directed the parties, by September 21, “to review [certain identified] documents ... [and] with respect to ... [any of those] documents that a party maintains should remain sealed ... [to] file a motion” in support of the party’s position that the documents should remain “subject to protection from public disclosure.” There are a substantial number of documents that were sealed when filed.

As set forth more fully in the attached Declaration of John F. Dienelt, his firm’s office is moving to a new location on September 28. In connection with that move, the sealed documents that must be reviewed by Defendants in order to make a determination as to which, if any, the Defendants will file a motion to continue confidential treatment have been packed for storage and shipment to the new office. Although it is not impossible to retrieve the documents, and to comply with the Court’s Order by September 21, that task is now logistically daunting. Accordingly, Defendants have asked Plaintiff to consent to an extension until October 12, by which time Defendants should have been able to unpack and review the documents and file any motion. Plaintiff has consented to the extension of time.

The parties have agreed to attempt to resolve this dispute through mediation, have selected a mediator, and have scheduled mediation for November 14, 2007, as they will report more fully on September 20, as directed. In the meantime, Defendants have an urgent need to know if the Court will allow the stipulated extension and therefore seek expedited consideration of this motion.

Dated: September 13, 2007

Respectfully submitted,

JERMAIN DUNNAGAN & OWENS PC
Attorneys for Defendants

By: s/Diane F. Vallentine
Diane F. Vallentine
3000 A Street, Suite 300
Anchorage, Alaska 99503
(907) 563-8844 (telephone)
(907) 563-7322 (fax)
Alaska Bar No. 7710177

CERTIFICATE OF SERVICE

This is to certify that on this 13th day of September, 2007, a true and correct copy of the foregoing document was served electronically, and by regular U.S. mail, on:

Jon T. Givens, Esq.
Bankston, Gronning, O'Hara, Sedor,
Mills, Givens & Heaphey, PC
601 W. 5th Avenue, Suite 900
Anchorage, AK 99501

Jeffrey M. Feldman, Esq.
Feldman Orlansky & Sanders
500 L Street, Suite 400
Anchorage, AK 99501

s/Diane F. Vallentine

LAW OFFICES OF
JERMAIN DUNNAGAN & OWENS
A PROFESSIONAL CORPORATION
3000 A STREET, SUITE 300
ANCHORAGE, ALASKA 99503
(907) 563-8844
FAX (907) 563-7322